



DOCKET FILE COPY ORIGINAL

**CLEARWATER HOUSE**

2187 ATLANTIC STREET  
STAMFORD, CT 06902

Tel: 203-425-4100

Fax: 203-425-4105

July 6, 1995

**FEDERAL EXPRESS**

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W. - Room 222  
Washington, DC 20554

RECEIVED

FCC MAIL ROOM

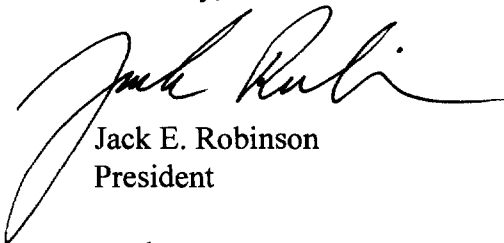
Re: PP Docket No. 93-253, Competitive Bidding Procedures

Dear Mr. Caton:

Please find enclosed an original plus nine (9) copies of National Telecom's comments on the *Further Notice of Proposed Rule Making* in the above-referenced proceeding.

I am filing two copies of this notice in accordance with Section 1.1206(a)(2) of the Commission's rules. Please stamp and return the third copy provided in the pre-stamped envelope to acknowledge your receipt.

Sincerely,



Jack E. Robinson  
President

Enclosures

No. of Copies rec'd  
List A B C D E

0+8

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**RECEIVED**

**JUL 10 7 1995**

**FCC MAIL ROOM**

In the Matter of )  
)  
Implementation of Section 309(j) )  
of the Communications Act - )  
Competitive Bidding )

PP Docket No. 93-253

**DOCKET FILE COPY ORIGINAL**

**COMMENTS OF NATIONAL TELECOM  
ON FURTHER NOTICE OF PROPOSED RULE MAKING**

National Telecom, Inc. ("NatTel"), hereby submits its comments on the Commission's *Further Notice of Proposed Rule Making* adopted and released June 23, 1995 (the "*Notice*").

NatTel has no objections to the *Notice* or the proposed rules contained therein. However, NatTel does believe that the commencement of the C-Block auction on one of the last business days before the beginning of the Labor Day holiday is not wise and suggests that the commencement date of the C-Block auction be extended one week to Wednesday, September 6, 1995. In addition, NatTel suggests that the short-form deadline be extended to August 4, 1995, and that upfront payments be due on August 22, 1995.

## **ARGUMENT**

### **COMMENCING AN AUCTION AT THE START OF THE LABOR DAY HOLIDAY WILL RESULT IN UNNECESSARY ADMINISTRATIVE INCONVENIENCE**

NatTel, perhaps more than anyone, is mindful of the need to get the C-Block auction started as soon as possible.<sup>1</sup> However, our collective rush to an auction should not be undertaken without regard to the practical effects of our actions.

There are numerous excellent reasons not to start a complicated auction right before the start of one of the biggest holidays of the year.<sup>2</sup> Putting aside the havoc that such an auction will cause to the vacation plans of virtually all of the participants (including the Commission staff), there appears to be no compelling governmental interest in beginning the auction on August 29th -- none whatsoever. Although "delay" seems to be the word which instills fear in the heart of the Commission at this time, an extension of one week surely cannot be considered to be material.

By extending all C-Block auction deadlines by one week, the Commission will also give potential auction participants more time to analyze the final rules and close deals with financial and strategic partners. Presently, participants will have only two weeks from the announcement of the "final" rules until the short-form deadline. In addition, an extension of the up-front payment date by one week will give participants more time during the

---

<sup>1</sup> NatTel was the only designated entity which filed objections to the extension of the **first** short-form deadline of February 28, 1995. *See, General Comment of National Telecom on the Timing of the C-Block Short-Form Application Deadline*, January 24, 1995.

<sup>2</sup> The MTA auction, wisely, was commenced immediately after the Thanksgiving holiday last year.

extremely slow month of August to complete financial arrangements and prepare to transfer funds to the Commission. (August is a particularly difficult month in which to close deals in the financial community because investors, attorneys and accountants are mostly away on vacation).

By extending all of the relevant C-Block auction dates by one week, the Commission will have a smoother auction and auction participants will be given additional crucial time to prepare.

### **CONCLUSION**

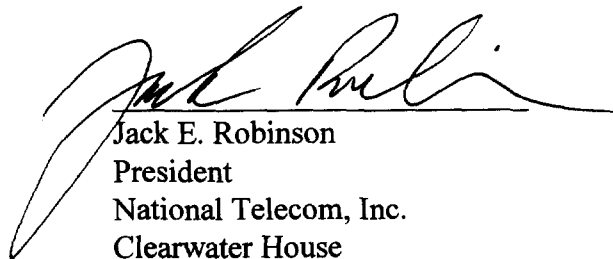
For the foregoing reasons, NatTel respectfully requests that the Commission adopt the proposed C-Block auction schedule listed below:

FCC Form 175 Applications Due	5:30 p.m., August 4, 1995
Upfront Payments Due	August 22, 1995
Auction Begins	September 6, 1995

Dated: July 6, 1995

Respectfully submitted,

**NATIONAL TELECOM, INC.**



Jack E. Robinson  
President  
National Telecom, Inc.  
Clearwater House  
2187 Atlantic Street  
Stamford, CT 06902  
(203) 425-4100